

**LOMURRO, MUNSON, LLC  
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**Attorneys for Defendants Scalable Commerce, LLC and National Data Analytics, LLC**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY  
CORPORATION, as assignee of  
individuals who are Covered  
Persons, JANE DOE-1, a law  
enforcement officer, JANE DOE-  
2, law enforcement officer,  
EDWIN MALDONADO, SCOTT  
MALONEY, JUSTYNA MALONEY,  
PATRICK COLLIGAN, PETER  
ANDREYEV AND WILLIAM SULLIVAN,

Plaintiffs,

vs.

SCALABLE COMMERCE, LLC,  
NATIONAL DATA ANALYTICS, LLC,  
RICHARD ROES 1-10, fictitious  
names of unknown individuals  
and ABC COMPANIES 1-10,  
fictitious names of unknown  
entities,

Defendants.

Civil Action No.:  
2:24-cv-04160

[Previously pending in  
the Superior Court of  
New Jersey, Law  
Division, Bergen  
County, BER-L-771-24]

**DIVERSITY DISCLOSURE STATEMENT**

Pursuant to Rule 7.1(a)(2) of the Federal Rules of Civil  
Procedure, Defendants Scalable Commerce, LLC, and National Data  
Analytics, LLC, hereby state they are California Limited  
Liability Companies with principal places of business in  
California.

Both Defendants Scalable Commerce, LLC, and National Data Analytics, LLC, are each wholly owned by individual Randall Kopf, a citizen of California.

Pursuant to 28 U.S.C. 1746 and Fed R. Civ. P. 11, I certify that the foregoing is true and accurate.

Respectfully submitted,

LOMURRO, MUNSON, LLC  
Attorneys for Defendants  
Scalable Commerce, LLC, and  
National Data Analytics, LLC

By: s/Eric H. Lubin, Esq.  
Eric H. Lubin, Esq.

Dated: March 26, 2024